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September 16, 2011

VIA ECF

Honorable Jack B. Weinstein
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 11D
New York, New York 10007

Re: Polanco, et al. v. The Brookdale Hospital Medical Center, No. 11-CV-2102

Dear Judge Weinstein:

This firm represents defendant the Brookdale Hospital Medical Center ("Brookdale") in the above-referenced case. We write to respectfully request a short extension to the current October 24, 2011 trial date for the following reasons. First, due to a recent bicycle accident that occurred after the original trial date was set, I will undergo surgery to repair my right hand, of which I currently have very limited use. The surgery requires that I wear a cast covering my entire hand and part of my arm, which will make writing and typing nearly impossible, as I am right hand dominant. The recovery period is approximately four weeks. Second, certain witnesses expected to testify at trial on Brookdale's behalf have already indicated their unavailability on the current trial date due to previously scheduled vacations and other matters. Third, the partner in charge of this case and lead trial attorney, Lorie Almon, is attending her brother's out-of-town wedding the weekend prior to the trial. In light of my injury, the unavailability of certain witnesses, and Ms. Almon's brother's wedding, we write to respectfully request a short extension of the current October 24, 2011 trial date to the week of November 14, 2011. This is Brookdale's first adjournment request.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

SEYFARTH SHAW LLP

/s/

Jeremi L. Chylinski

cc: David C. Wims (via ECF)

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